

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, Nevada Bar Number 12277  
12 *ksinclair@sinclairbraun.com*  
13 SINCLAIR BRAUN LLP  
14 16501 Ventura Boulevard, Suite 400  
15 Encino, California 91436  
16 Telephone: (213) 429-6100  
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant  
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN PER L.R. IA 11-1(b)(ii)

22 Gary L. Compton, State Bar No. 1652  
23 2950 E. Flamingo Road, Suite L  
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 BANK OF AMERICA, N.A.,

28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 3:20-cv-00046-MMD-WGC

**STIPULATION AND  
[PROPOSED] ORDER TO EXTEND  
CHICAGO TITLE'S DEADLINE TO  
FILE REPLY BRIEF**

Plaintiff Bank of America, N.A. ("Bank of America"), on the one hand, and defendant Chicago Title Insurance Company ("Chicago Title"), on the other hand, by and through their respective attorneys of record, hereby agree and stipulate as follows:

1. On August 6, 2020, Chicago Title filed its motion to dismiss (ECF No. 27) Bank of America's First Amended Complaint (ECF No. 24);

2. On September 3, 2020, Bank of America filed its response in opposition to Chicago Title's motion to dismiss (ECF No. 36);

3. Chicago Title requests a two-week extension of its deadline to respond to file its reply In support of its motion to dismiss, through and including Thursday, September 17, 2020;

4. Chicago Title requests this extension because of the intervening Labor Day Holiday weekend and to afford its counsel additional time to review and respond to Bank of America's arguments in opposition to the motion to dismiss;

5. Counsel for Bank of America does not oppose the extension;

6. This is the first request for an extension made by counsel for Chicago Title which is made in good faith and not for the purposes of delay.

**IT IS SO STIPULATED** that Chicago Title's reply in support of its motion to dismiss shall be due on September 17, 2020.

Dated: September 4, 2020

WRIGHT, FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner  
DARREN T. BRENNER  
Attorneys for Plaintiff  
BANK OF AMERICA, N.A.

Dated: September 4, 2020

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendant  
CHICAGO TITLE INSURANCE COMPANY

**IT IS SO ORDERED.**

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

UNITED STATES DISTRICT COURT JUDGE